



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

MICHAEL A. CARDOZO
Corporation Counsel

BRIAN J. FARRAR
Assistant Corporation Counsel
Phone: (212)341-0797
Fax: (212) 788-0367
Email: bfarrar@law.nyc.gov

September 28, 2010

BY ECF

Honorable Lois Bloom
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Marcos Castro v. City of New York, et al.
CV 10 2322 (JG) (LB)

Your Honor:

I am the Assistant Corporation Counsel assigned to the defense of the City of New York in the above-referenced matter. Pursuant to Your Honor's August 31, 2010 Scheduling Order, enclosed please find the parties' Rule 26 Meeting Report which has been signed by the parties and is being submitted for the Court's endorsement.

I thank the Court for its time and attention to this matter.

Respectfully submitted,

/S

Brian J. Farrar
Assistant Corporation Counsel

Enc.

cc: Darius Wadia, Esq. (by ECF)
Attorney for plaintiff
233 Broadway, Suite 2208
New York, New York 10279

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
MARCOS CASTRO,

**RULE 26 MEETING REPORT
AND JOINT DISCOVERY
PLAN**
Plaintiff,

-against-

CV 10 2322 (JG) (LB)

THE CITY OF NEW YORK, JOHN and JANE DOES 1 through
12,

Defendants.
-----x

WHEREAS, the parties have conferred pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and the Court's August 31, 2010 Order;

NOW, therefore, the parties respectfully submit the following proposed discovery plan:

- Deadline for all Rule 26(a) disclosures: October 19, 2010
- Joinder of additional parties: December 10, 2010
- Amendment of pleadings: December 10, 2010
- Fact Discovery to be completed by: April 4, 2011
- Expert Discovery, if any, to be completed by: May 2, 2011
 - Plaintiff's report due: May 16, 2011
 - Defendant's report due: June 6, 2011

- Dispositive Motions fully briefed:

June 27, 2011

Dated: New York, New York
_____, 2010

Darius Wadia, Esq.
Attorney for plaintiff
233 Broadway, Suite 2208
New York, New York 10279

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendant City of New York
100 Church Street, Room 3-312
New York, New York 10007
(212) 341-0797

By: _____

Darius Wadia, Esq.

By: _____

Brian J. Farrar

Assistant Corporation Counsel

SO ORDERED:

HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE